

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____	}	
UNITED STATES OF AMERICA	}	
	}	
V.	}	CRIMINAL ACTION
	}	
MICHAEL AMBERS	}	NO. 04-10390-WGY
DEFENDANT	}	
_____	}	

DEFENDANT MICHAEL AMBERS MOTION TO CONTINUE TRIAL
SCHEDULED FOR FEBRUARY 27, 2006

Now comes the Defendant, Michael Ambers, by and through his counsel, Frank D. Camera, hereby requests this Court continue the trial that is currently scheduled for February 27, 2006 to April 10, 2006.

Good cause exists for this extension in that the Defendant, as the Court is aware, is considered an Armed Career Criminal. Accordingly, counsel is in the process of attacking one of the Defendant's prior offenses that constitute a predicate for purposes of the ACCA. If this is successful, the Defendant will be changing his plea. The continuance of this trial and any extension will not interfere or prejudice the Government in preparing its case. Counsel, on behalf of the Defendant, assents to this Court excluding from the Speedy Trial Act this period of time.

Respectfully Submitted,
Michael Ambers,
By his attorney,

/s/ Frank D. Camera
Frank D. Camera
B.B.O. #635930
56 N. Main Street #321
Fall River, MA 02720
508-677-2878
508-677-2876

Dated: February 16, 2006

CERTIFICATE OF SERVICE

I, Frank D. Camera, hereby certify that I have delivered a true copy of the within document to all parties of record by electronic filing on this sixteenth day of February 2006..

/s/ Frank D. Camera